

**Remarks**

This Application has been carefully reviewed in light of the Office Action mailed September 19, 2008. Applicant appreciates the Examiner's consideration of the Application. Although Applicant believes all claims are allowable without amendment, to advance prosecution Applicant has made a clarifying amendment to independent Claims 1, 8, and 12. These amendments are not considered narrowing or necessary for patentability. Applicant respectfully requests reconsideration and allowance of all pending claims.

**I. Claims 12-21 Recite Patentable Subject Matter**

The Examiner rejects Claims 12-21 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Although Applicant believes Claims 12-21 are directed to patentable subject matter as written, Applicant has made a clarifying amendment to independent Claim 12, which should obviate the Examiner's rejections under 35 U.S.C. § 101. For at least these reasons, Applicant respectfully requests reconsideration allowance of independent Claim 12 and its dependent claims.

**II. The Claims are Allowable over Yeh**

The Examiner rejects Claims 1-30 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent 6,772,216 to Ankireddipally, et al. (referred to as hereinafter by co-inventor "Yeh" to avoid confusion with a prior reference labeled *Ankireddipally*). Applicant respectfully traverses these rejections.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987) (emphasis added); M.P.E.P. ch. 2131. "The *identical invention* must be shown in as *complete detail as contained* in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989) (emphasis added); *see also* M.P.E.P. ch. 2131. In addition, "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); M.P.E.P. ch. 2131.

The Federal Circuit recently clarified this standard in *Net Moneyin, Inc. v. Verisign, Inc.*, 2008 WL 4614511 (Fed. Cir. 2008). In *Net Moneyin*, the Federal Circuit held that a finding of anticipation under 35 U.S.C. § 102 is proper only when a “reference discloses within the four corners of the document not only all of the limitations claimed but also *all of the limitations arranged or combined in the same way* as recited in the claim.” *Net Moneyin* at \*10 (emphasis added). The prior art reference must “*clearly and unequivocally* disclose the claimed invention ... *without any need for picking, choosing, and combining various disclosures not directly related to each other* by the teachings of the cited reference.” *Id.* (emphasis added, internal typographical notations omitted).

As demonstrated below, Applicant respectfully submits that *Yeh* fails to disclose, either expressly or inherently, each and every limitation recited in Applicant’s independent claims. Applicant discusses independent Claims 1 and 12 as examples.

**A. Independent Claims 1 and 8 and their Dependent Claims are Allowable**

Independent Claim 1, which Applicant discusses as an example, is directed to a schema generator that comprises computer software stored on a computer readable storage medium and operable to:

- parse a plurality of transaction definitions for a software system, wherein each transaction definition comprises one or more parameters; and
- generate, in response to parsing the plurality of transaction definitions, a plurality of schema definitions for at least a portion of the parsed transaction definitions, wherein the schema definitions are written in a self-describing language;
- wherein a first schema definition is operable to map the one or more parameters associated with a first transaction definition to a first document written in the self-describing language; and
- wherein a second schema definition is operable to map a second document written in the self-describing language to the one or more parameters associated with a second transaction definition.

As a first example, the cited portions of *Yeh* fail to disclose, teach, or suggest “pars[ing] a plurality of transaction definitions for a software system, wherein each transaction definition comprises one or more parameters” and “generat[ing], in response to parsing the plurality of transaction definitions, a plurality of schema definitions for at least a portion of the parsed transaction definitions, wherein the schema definitions are written in a

self-describing language,” as recited in Claim 1 as amended. As allegedly disclosing these limitations, the Examiner cites primarily to Figure 13 of *Yeh*. *Office Action* at 4-5.

Figure 13 of *Yeh* discloses a method for message processing, including determining the message type. *Yeh* at Figure 13 and 10:40-42. In particular, Figure 13 discloses receiving an application interaction message (at 404) and determining if the MSGTYPE of the message is REQUEST, REPLY, CANCEL, PUBLISH, NOTIFY, or SUBSCRIBE (at 412-422). Thus, Figure 13 plainly relates to message processing. However, nowhere does Figure 13 disclose, teach, or suggest “*pars[ing] a plurality of transaction definitions* for a software system, wherein each transaction definition comprises one or more parameters” and “*generat[ing], in response to parsing the plurality of transaction definitions, a plurality of schema definitions for at least a portion of the parsed transaction definitions*, wherein the schema definitions are written in a self-describing language,” as recited in Claim 1 as amended. At best Figure 14 discloses parsing a plurality of messages (not the transaction definitions recited in Claim 1) and taking some action based on that parsing. There is no disclosure, teaching, or suggestion that the action taken based on that parsing of the message is “generat[ing], in response to parsing the plurality of transaction definitions, a plurality of schema definitions for at least a portion of the parsed transaction definitions, wherein the schema definitions are written in a self-describing language,” as recited in Claim 1 as amended.

The Examiner identifies the DTDs disclosed at column 16, line 21 through column 18, line 67 as allegedly disclosing the generated transaction definitions. *Office Action* at 4. However, nowhere do the cited portions of *Yeh* disclose, teach, or suggest that these DTDs are generated based on the parsing shown in Figure 13 of *Yeh* (which the Examiner cites as disclosing “*pars[ing] a plurality of transaction definitions* for a software system, wherein each transaction definition comprises one or more parameters”). Thus, the DTDs disclosed in the cited portion of *Yeh* cannot be said to be “*generat[ed], in response to parsing the plurality of transaction definitions, a plurality of schema definitions for at least a portion of the parsed transaction definitions*, wherein the schema definitions are written in a self-describing language,” as recited in Claim 1 as amended.

As another example, the cited portions *Yeh* also fail to disclose, teach, or suggest “wherein a first schema definition is operable to map the one or more parameters associated with a first transaction definition to a first document written in the self-describing language,” as recited in Claim 1. The Examiner apparently equates the DTDs, which the Examiner alleges are written in XML, to “the schema definitions . . . written in a self-describing language,” as recited in Claim 1. Whether or not this equation is appropriate, for the Examiner’s alleged equations to even possibly disclose the mapping limitations recited in Claim 1, it would have to be these DTDs that are operable to perform the mappings recited in the last two elements of Claim 1. However, the cited portions do not disclose that these DTDs in *Yeh* perform the particular mappings recited in Claim 1.

As allegedly disclosing “wherein a first schema definition is operable to map the one or more parameters associated with a first transaction definition to a first document written in the self-describing language,” as recited in Claim 1, the Examiner identifies the XML application interaction documents 40 shown in Figure 1 of *Yeh*. In addition, the Examiner cites Figures 16-17 of *Yeh*, particularly stating “mapping ‘MSGTYPE = Request’ to request message 300 and sending said XML application interaction document to Web Server 220.” *Office Action* at 5. It does not appear to Applicant that these cited portions disclose that any DTD is operable to map the one or more parameters [‘TYPE,’ ‘SIZE,’ ‘NAME,’ and ‘VERSION,’ according to the Examiner] associated with a first transaction definition [‘REQUEST,’ ‘REPLY,’ ‘CANCEL,’ and ‘PUBLISH,’ according to the Examiner] to a first document written [XML application interaction documents 40, according to the Examiner] in a self-describing language, as would be required for the cited portions of *Yeh* to even possibly disclose the limitations recited in Claim 1.

Applicant respectfully requests that if the Examiner maintains these rejections using these cited portions of *Yeh*, the Examiner identify with greater particularity how the cited DTDs actually perform the mapping limitations recited in Claim 1.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 1 and its dependent claims. For at least certain analogous

reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 8 and its dependent claims.

**B. Independent Claims 12 and 22 and their Dependent Claims are Allowable**

Independent Claim 12, which Applicant discusses as an example, is directed to a transaction processing system that comprises:

- a software service operable to receive a transaction request and to generate a first object associated with the transaction request;
- an object generator operable to convert the first object into a first document written in a self-describing language; and
- a document generator operable to convert the first document into a first transaction message according to a schema associated with a first transaction type determinable from the first document.

At a minimum, *Yeh* fails to disclose, teach, or suggest “a software service operable to receive a transaction request and to generate a first object associated with the transaction request” and “an object generator operable to convert the first object into a first document written in a self-describing language,” as recited in Claim 12.

At the outset, Applicant notes that it is difficult for Applicant to decipher which particular elements of Figure 16 of *Yeh* the Examiner is attempting to equate with which particular limitations recited in Claim 12. This is due primarily to the large number of components cited by the Examiner as allegedly disclosing each element of the claim. Thus, Applicant is forced to speculate as to which particular elements of *Yeh* the Examiner is actually attempting to equate to the particular limitations recited in Claim 12. In any event, Applicant will attempt to respond to the Examiner’s rejection.

As allegedly disclosing the “software service operable to receive a transaction request” recited in the first element of Claim 12, the Examiner cites Figure 16 of *Yeh*. *Office Action* at 8. As allegedly disclosing that the software service is operable to generate a first object associated with the transaction request, the Examiner cites a variety of portions of *Yeh*. However, it appears to Applicant that the Examiner is attempting to equate the message 320 disclosed in Figure 16 of *Yeh* to the object recited in Claim 12.

Next, as allegedly disclosing the “object generator” recited in the second element of Claim 12, the Examiner cites blocks 532-540 of Figure 17 and elements 320-340 of Figure 16 of *Yeh*. The object generator of Claim 12 is “operable to convert the first object into a first document written in a self-describing language.” It appears that the Examiner is attempting to equate element 340 of *Yeh* to the first document written in the self-describing language recited in Claim 12. Whether or not these equations are appropriate, for the Examiner’s alleged equations to even possibly disclose the limitations recited in Claim 12, *Yeh* would have to disclose an object generator that converts the element 320 (which the Examiner appears to equate to a first object, as recited in Claim 12) into element 340 (which the Examiner appears to equate to a first document written in a self-describing language, as recited in Claim 12]. However, this is not disclosed in *Yeh*.

Instead, *Yeh* discloses that protocol plug-in 224 parses the request message 300, in box 514, to produce application-specific data for catalog service application 228, and then invokes catalog service application 228, in box 532, providing the necessary input via message 320. *Yeh* at 20:66-21:3. *Yeh* then discloses that protocol plug-in 224 then receives output catalog update data, in box 532, from catalog service application 228 via message 330. In box 540, protocol plug-in 224 sends reply message 340 to the requesting application 214. Thus, nowhere does the cited portion of *Yeh* disclose, teach, or suggest an object generator that converts the element 320 (which the Examiner appears to equate to a first object, as recited in Claim 12) into element 340 (which the Examiner appears to equate to a first document written in a self-describing language, as recited in Claim 12]. Therefore, the cited portions of *Yeh* fail to disclose, teach, or suggest “a software service operable to receive a transaction request and to generate a first object associated with the transaction request” and “an object generator operable to convert the first object into a first document written in a self-describing language,” as recited in Claim 12.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 12 and its dependent claims. For at least certain analogous reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 22 and its dependent claims.

**III. No Waiver**

All of Applicant's arguments and amendments are without prejudice or disclaimer. Additionally, Applicant has merely discussed example distinctions from the reference cited by the Examiner. Other distinctions may exist, and Applicant reserves the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicant does not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicant are sufficient to overcome the Examiner's rejections.

**Conclusion**

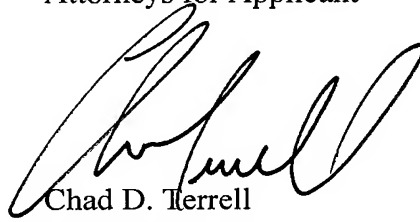
Applicant has made an earnest attempt to place the Application in condition for allowance. For at least the foregoing reasons, Applicant respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any way, the Examiner is invited to contact the undersigned attorney for Applicant, Chad D. Terrell, at the Examiner's convenience at (214) 953-6813.

Although Applicant believes no fees are due, the Commissioner is hereby authorized to charge any necessary fees or credit any overpayment to Deposit Account No. 05-0765 of Electronic Data Systems Corporation.

Respectfully submitted,

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